

United States District Court
Southern District of New York

Civil No. _____

Crim. No. # 198 CR-01023-LAK-9

Ahmed Gharani

Defendant-Petitioner

-v-

MEMO ENDORSED

United States of America

Plaintiff-Respondent

(Pro se) Motion For Leave Requesting To File An Additional Claim To Petitioner's June 23, 2020, Filed Rule 60 Motion As A Precaution Under Davis 139 S.Ct. 2319 (June 24, 2019)

Petitioner moves this court to take judicial notice that this morning he handled the officer working the prisoners living unit A Rule 60 Motion under two issues: (1) Jurisdictional Defect, and (2) Davis supra.. However, Petitioner just mentioned Conspiracy was no longer a violent Crime, but he also will raised that the "statute" Petitioner was "Charged, Indicted & Convicted" is Constitutionally Vague. Petitioner felt that just raising the Davis, is was enough to cover every issue under Davis. However, as a precaution Petitioner is specifically raising here this other issue because the Davis issue ends tomorrow. So he still on time.

Petitioner further filed this morning an accompanied Motion for a sixty(60) Days Extension OF Time TO FILE a Rule 15 (a) or (c) Motion to "Clarify, Amend or Supplement" his issues & arguments he raised in his Rule 60 motion. He will submit this issue & argument as well.

Respectfully Submitted,

Date! June 23, 2020,

/s/ A. Ghay
Ahmed Gharani's Signature.

Certificate OF Service

I, Ahmed Ghailani, States that on the 23rd, day of June, year 2020, he mailed a copy of the foregoing Motion to the name & address below:

U.S. Dist. Attorney's Office,
One St. Andrew's Plaza,
New York, NY 10007

Respectfully Submitted,
/s/ L.A. Kaplan,
Ahmed Ghailani's Signature

Denied. These are not proper
subjects for judicial notice

SO ORDERED

LEWIS A. KAPLAN, USDI

12/2/2020